

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CARNEGIE INSTITUTION OF  
WASHINGTON and M7D CORPORATION,

Plaintiffs,

v.

PURE GROWN DIAMONDS, INC. and  
IIA TECHNOLOGIES PTE. LTD. d/b/a  
IIA TECHNOLOGIES,

Defendants.

Case No. 20-cv-0189 (JSR)

**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that Defendants Pure Grown Diamonds, Inc. and Ila Technologies Pte. Ltd. (collectively, “Defendants”), by and through their undersigned counsel, will move this Court for entry of an order and judgment pursuant to Federal Rule of Civil Procedure 56 that U.S. Patent No. 6,858,078 and U.S. Patent No. RE41,189 are invalid and not infringed by Defendants.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the schedule set by the Court on September 2, 2020, Defendants shall file their moving papers on October 5, 2020, Plaintiffs shall file their opposition papers on October 21, 2020, Defendants shall file their reply papers on October 28, 2020, and oral argument on Defendants’ motion will be heard before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007 on November 17, 2020 at 3:00 p.m.

Dated: September 28, 2020

Respectfully submitted,

s/ William P. Deni, Jr.

William P. Deni, Jr.

J. Brugh Lower

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